

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

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|                                 |   |                          |
|---------------------------------|---|--------------------------|
| In re:                          | ) | Chapter 11               |
|                                 | ) |                          |
| JOANN INC., et al. <sup>1</sup> | ) | Case No. 25-10068 (CTG)  |
|                                 | ) |                          |
| Debtors.                        | ) | (Jointly Administered)   |
|                                 | ) |                          |
|                                 | ) | <b>Re: Docket No. 17</b> |

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**NOTICE OF FILING REVISED PROPOSED ORDER**

**(I) APPROVING BIDDING PROCEDURES, (II) SCHEDULING CERTAIN  
DATES AND DEADLINES WITH RESPECT THERETO, (III) APPROVING  
THE FORM AND MANNER OF NOTICE THEREOF, (IV) APPROVING  
THE STALKING HORSE AGREEMENT, (V) ESTABLISHING NOTICE  
AND PROCEDURES FOR THE ASSUMPTION AND ASSIGNMENT OF  
CONTRACTS AND LEASES, (VI) AUTHORIZING THE ASSUMPTION AND  
ASSIGNMENT OF ASSUMED CONTRACTS AND LEASES, (VII) APPROVING  
THE SALE OF ASSETS, AND (VIII) GRANTING RELATED RELIEF**

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**PLEASE TAKE NOTICE** that, on January 15, 2025, the above-captioned debtors and debtors in possession (collectively, the “Debtors”) filed the *Motion of Debtors for Entry of an Order (I) Approving Bidding Procedures, (II) Scheduling Certain Dates and Deadlines With Respect Thereto, (III) Approving the Form and Manner of Notice Thereof, (IV) Approving the Stalking Horse Agreement, (V) Establishing Notice and Procedures for the Assumption and Assignment of Contracts and Leases, (VI) Authorizing the Assumption and Assignment of Assumed Contracts and Leases, (VII) Approving the Sale of Assets, and (VIII) Granting Related Relief*

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<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: JOANN Inc. (5540); Needle Holdings LLC (3814); Jo-Ann Stores, LLC (0629); Creative Tech Solutions LLC (6734); Creativebug, LLC (3208); WeaveUp, Inc. (5633); JAS Aviation, LLC (9570); joann.com, LLC (1594); JOANN Ditto Holdings Inc. (9652); Dittopatterns LLC (0452); JOANN Holdings 1, LLC (9030); JOANN Holdings 2, LLC (6408); and Jo-Ann Stores Support Center, Inc. (5027). The Debtors’ mailing address is 5555 Darrow Road, Hudson, Ohio 44236.

[Docket No. 17] (the “Motion”). Attached thereto as Exhibit A was a proposed form of order granting the relief requested in the Motion (the “Proposed Order”).

**PLEASE TAKE FURTHER NOTICE** that attached hereto as Exhibit A is a revised proposed form of order granting the relief requested in the Motion (the “Revised Proposed Order”).

**PLEASE TAKE FURTHER NOTICE** that attached hereto as Exhibit B is a redline comparing the Revised Proposed Order to the Proposed Order.

**PLEASE TAKE FURTHER NOTICE** that the Debtors intend to present the Revised Proposed Order to the Court for approval at the hearing scheduled for February 14, 2025, at 9:30 a.m. (ET).

*[Remainder of Page Intentionally Left Blank]*

Dated: February 13, 2025  
Wilmington, Delaware

*/s/ Patrick J. Reilley*

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**COLE SCHOTZ P.C.**

Patrick J. Reilley (No. 4451)  
Stacy L. Newman (No. 5044)  
Michael E. Fitzpatrick (No. 6797)  
Jack M. Dougherty (No. 6784)  
500 Delaware Avenue, Suite 1410  
Wilmington, Delaware 19801  
Telephone: (302) 652-3131  
Facsimile: (302) 652-3117  
Email: preilley@coleschotz.com  
snewman@coleschotz.com  
mfitzpatrick@coleschotz.com  
jdougherty@coleschotz.com

**KIRKLAND & ELLIS LLP**

**KIRKLAND & ELLIS INTERNATIONAL LLP**  
Joshua A. Sussberg, P.C. (admitted *pro hac vice*)  
Aparna Yenamandra, P.C. (admitted *pro hac vice*)  
601 Lexington Avenue  
New York, New York 10022  
Telephone: (212) 446-4800  
Facsimile: (212) 446-4900  
Email: joshua.sussberg@kirkland.com  
aparna.yenamandra@kirkland.com

- and -

Anup Sathy, P.C. (admitted *pro hac vice*)  
Jeffrey Michalik (admitted *pro hac vice*)  
Lindsey Blumenthal (admitted *pro hac vice*)  
333 West Wolf Point Plaza  
Chicago, Illinois 60654  
Telephone: (312) 862-2000  
Facsimile: (312) 862-2200  
Email: anup.sathy@kirkland.com  
jeff.michalik@kirkland.com  
lindsey.blumenthal@kirkland.com

*Proposed Co-Counsel to the Debtors  
and Debtors in Possession*

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and Debtors in Possession*